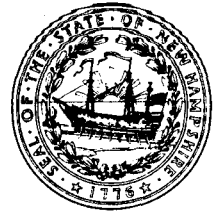




The State of New Hampshire  
**Department of Environmental Services**



Michael P. Nolin  
Commissioner

August 24, 2004

Lawrence Olson, Jr.  
Olson's Mobile Home Park  
1 Darlene Lane  
Litchfield, NH 03052

**LETTER OF DEFICIENCY WSEB 04-139**  
CERTIFIED MAIL # 7000 0600 0023 9933 7753

Subject: Litchfield - Public Water System: Olson's Mobile Home Park (EPA #: 1373030)

Dear Mr. Olson:

The records of the Department of Environmental Services (DES) show that the Olson's Mobile Home Park water system is classified as a public water system (PWS), as defined by RSA 485:1-a. A PWS is defined as any water system supplying 15 or more services, or 25 or more people, for 60 or more days per year. Pursuant to NH Admin. Rule Env-Ws 381, all community and non-transient non-community water systems are subject to the requirements of the Lead and Copper Corrosion Control Rule.

As you know, the subject water system has exceeded the lead and/or copper action levels during each round of sampling since 1993. On September 8, 1994, the water system sent to DES an Optimal Corrosion Control Treatment proposal that recommended the use of calcium carbonate to address the lead and copper exceedances. DES approved the calcium carbonate treatment proposal and requested that the treatment be installed by December 31, 1997.

To date, the approved treatment has not been installed. A review of the system's file indicates that during the intervening years the possibility that construction of the proposed Hudson Circumferential Highway Project would greatly impact the water system was cited as a reason to delay modifications to the water system. In addition, the file indicates that consideration was given to connecting your water system to a Pennichuck Water Works water line, which would make treatment unnecessary. Most recently, the file indicates that you were considering installation of a large tank and the purchase of water from Pennichuck. None of these events has occurred, and none are known by DES to be imminent.

The water system's most recent lead and copper samples, collected during May and June 2004, show the 90<sup>th</sup> percentile for lead to be 0.028 mg/L and for copper to be 1.05 mg/L. The action levels for lead and copper are 0.015 mg/L and 1.3 mg/L, respectively. Thus, the sample results continue to exceed the action level for lead. This fact, coupled with the fact that none of the events cited in the previous paragraph to justify delaying the installation of treatment have occurred, makes it imperative that treatment to address the lead exceedance be installed as soon as possible. The failure to install corrosion control in response to continued exceedances of the lead and/or copper action levels has placed the water system in violation of Env-Ws 381.

DES believes the deficiency can be corrected by taking the following actions:

1. **By September 24, 2004**, submit to DES for review and approval a written, updated Optimal Corrosion Control Treatment proposal; and
2. **Within 30 days of receiving DES approval**, install corrosion control treatment and notify DES in writing of the installation.

In the event compliance is not achieved within this period, DES may take further enforcement action, including issuing an administrative order requiring the deficiencies to be corrected, initiating administrative fine proceedings and/or referring the matter to the NH Department of Justice for imposition of appropriate penalties.

The Optimal Corrosion Control Treatment proposal as requested above should be addressed as follows:

Rebecca Presby  
Department of Environmental Services  
Water Supply Engineering Bureau  
29 Hazen Drive, PO Box 95  
Concord, NH 03302-0095

Please contact Ms. Presby by telephone at (603) 271-2516 or by e-mail at [rpresby@des.state.nh.us](mailto:rpresby@des.state.nh.us) if you have any questions concerning the requirements of an Optimal Corrosion Control Treatment proposal. If you have any questions regarding this letter, please contact Alan Leach by telephone at (603) 271-2854 or by e-mail at [aleach@des.state.nh.us](mailto:aleach@des.state.nh.us).

Sincerely,

**COPY** 

Rene Pelletier, P.G., Manager  
Land Resource Programs

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cc: Gretchen R. Hamel, DES Legal Unit Administrator  
William Houser, Primary Operator  
Roderick Jones, Town of Litchfield Health Officer  
EPA, Region 1